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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

GLEN E. FRIEDMAN, Plaintiffs, v. THIERRY GUETTA a/k/a MR. BRAINWASH; and DOES 1 though 10, inclusive, Defendants.	Case No. CV10-0014 DDP (JCx) Honorable Dean D. Pregerson **DECLARATION OF AREN KAVCIOGLU IN SUPPORT OF MOTION TO COMPEL PRODUCTION REGARDING REQUEST FOR PRODUCTION NO. 34** **[DISCOVERY MATTER – LR 37-1]** Date: February 1, 2011 Time: 9:30 a.m. Courtroom: 20, 3rd Floor

DECLARATION OF AREN KAVCIOGLU

I am an attorney for Plaintiff Glenn E. Friedman ("Plaintiff"). I make the following statements based upon my own personal knowledge.

1. Attached hereto as Exhibit A is a copy of the Scheduling Order in this case.

2. Attached hereto as Exhibit B is a true and correct copy of Plaintiff's Request for Production of Documents, Set Three to Defendant Thierry Guetta ("Defendant")

3. Attached hereto as Exhibit C is a true and correct copy of Defendant's Response to Plaintiff's Request Production of Documents, Set Three.

4. Attached hereto as Exhibit D is a true and correct copy of an email sent by Douglas A. Linde of The Linde Law Firm to counsel for Defendant, John Juenger, on December 23, 2010.

5. On December 30, 2010, I participated in a Rule 37 conference with Defendant's counsel, John Juenger, at Mr. Juenger's office regarding Defendant's response to Plaintiff's Request for Production ("RFP") Set Three. We were unable to resolve our disputes regarding Request No. 34. Accordingly, Plaintiff files this Motion for relief.

6. Attached hereto as Exhibit E are true and correct copies of excerpts from the deposition of Defendant Thierry Guetta in this action.

7. Attached hereto as Exhibit F is a true and correct copy of Exhibit 12 from the deposition of Defendant in this action.

8. Attached hereto as Exhibit G is a true and correct copy of Exhibit 13 from the deposition of Defendant in this action.

9. Attached hereto as Exhibit H are true and correct copies of documents produced by Defendant in this action, bates stamped by Defendant as pages G7/G8 and G7A and G8A, representing postcards prepared by Defendant for the art show at issue on this Motion.

I declare under the penalty of perjury that the foregoing is true and correct of my own personal knowledge. If called as a witness, I could and would testify competently to all of it. Signed on this 3rd day of January, 2011.

_/s/ Aren Kavcioglu________________
Aren Kavcioglu, Declarant